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Attorneys for Defendant  
Otto Trucking LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto  
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF HAYES P. HYDE IN  
SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF ITS  
SECOND SUPPLEMENTAL BRIEF IN  
SUPPORT OF ITS MOTION FOR ORDER  
TO SHOW CAUSE [DKT. 2053]**

Courtroom: 8  
Judge: Hon. William Alsup  
Trial: December 4, 2017

I, Hayes P. Hyde, declare as follows:

1. I am an attorney at the law firm of Goodwin Procter, LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion to File under Seal Portions Its Supplemental Brief in Support of Its Motion for Order to Show Cause ("Motion") [Dkt. No. 2053].

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Ex. 5 to the Decl. of Lindsay Cooper	Highlighted portions in red boxes

3. The above-referenced Exhibit includes highly confidential, sensitive business information relating to negotiations of the terms of Otto Trucking's agreements, its corporate structure, and sensitive financial and business information. This information is not publicly known, and its confidentiality is strictly maintained. I understand that this information could be used by competitors to Otto Trucking's detriment, including in the context of negotiating business deals. If such information were made public, I understand Otto Trucking's competitive standing could be significantly harmed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 27th day of October, 2017 in San Francisco, California.

/s/ Hayes P. Hyde  
Hayes P. Hyde

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on October 27, 2017. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 27th day of October 2017.

/s/ Hayes P. Hyde  
Hayes P. Hyde